

# Guidelines for Preparing your Annual Drinking Water Consumer Confidence Report

Community water systems are required to deliver a Consumer Confidence Report (CCR) to their consumers by July 1 each year. The CCR is required to provide consumers with water quality and other water system information from the previous calendar year. Water systems are strongly encouraged to use the report to also educate their consumers about the importance of having safe, reliable drinking water delivered to their taps and the efforts taken to protect public health. Please take advantage of this opportunity to highlight significant improvements, operational accomplishments, and other information about the value of your drinking water. Ideas include: adding graphics/enhanced subtitles, ongoing efforts on source water protection, education on water conservation, and alternative/low irrigation landscaping efforts.

NH Administrative Rule Env-Dw 811, Consumer Confidence Reports, outlines specific requirements for the content and distribution of your Consumer Confidence Report (CCR). CCR templates and a CCR Certification Form can be found on the NHDES website to assist in the preparation of your CCR. Using the templates and adding any text needed to meet your system's individual demands helps assure that you include all of the required information in your CCR. Most of the text in the templates is mandatory, so you should not change or delete information without first discussing it with the Drinking Water and Groundwater Bureau (DWGB) staff.

## **INSTRUCTIONS - HOW TO USE THE TEMPLATES:**

Two templates can be found on the NHDES CCR webpage to help you prepare your CCR; one template for the report brochure and one for a table of water quality and other required system data. The templates contain mandatory text and will assist you in preparing an acceptable CCR. **Both are necessary for a complete CCR.** 

#### **Report Brochure Template**

- **Open** the **report brochure** template and update with information specific to your system.
- Italic text are directions and should be removed after the system information is inserted.
- BLUE text is mandatory and must remain in the brochure.
- The highlighted text notes areas for information specific to YOUR system and MUST be filled in.
   Examples are included for your convenience. Delete the examples once you've entered your information.
- Delete any highlighted items that you are NOT using.
- The text in **BLACK** is included to help explain the purpose of the CCR and its contents. Note: The definitions must be included in the CCR IF applicable to the content of the report.
- List water sources; **type**, **general location**, and a brief summary of sources susceptibility to contamination and how to obtain the systems Source Water Assessment.
  - You can link to your Source Water Assessment from the DES webpage.
- List the names and contact information of water system's owner and primary operator and the dates and times of any opportunities for public participation (i.e. annual/board meetings).

#### Water Systems that Add Fluoride

 For water systems that fluoridate, NH State Statute requires the following statement to be added to the text of the CCR: "Your public water supply is fluoridated. According to the Centers for Disease Control and Prevention, if your child under the age of 6 months is exclusively consuming infant formula reconstituted with fluoridated water, there may be an increased chance of dental fluorosis. Consult your child's health care provider for more information."

# **Report Table Template**

Provide information about **detected** water quality results, violations, required assessments, additional testing results, and bulk water deliveries in the report table.

- The table template is not color coded because the information is unique to each system. This table includes the regulated contaminants that MUST be reported IF detected.
- The table template includes mandatory text such as Maximum Contaminant Level (MCL), units, source information, and health effects language.
- Enter the detect value in the "Level Detected" column. Your detected values must be reported as whole numbers. Please review <a href="Env-Dw 811">Env-Dw 811</a>, Appendix B, on how to perform the calculation to a whole number for your detected contaminants.
- The table must include water quality data from the previous testing year. If you did not monitor for a contaminant in the last year, but did at some point in the last 5 years. Any contaminant detections from that last test must be reported.
  - For example, if you did not sample for Inorganic Compounds (IOC) in 2019, but the most recent sample in 2017 showed a detection of arsenic, you must list that arsenic detection in the CCR.
- **Do not report non-detects**. If your system did not have a detection of any of the contaminants listed, you should delete that entire row from the table. This will decrease the length of the report and make it easier for your customers to read.

## Reporting Disinfection By-Products.

Water systems that disinfect monitor for disinfection by-products (DBP). When reporting TTHMs and HAAs on their CCR, systems that disinfect **should**;

- o Report the "Range" (low to high) of all results for TTHMs & HAAs for the year.
- Report as the "Amount Detected" the highest Locational Running Annual Average (LRAA)
   calculated during the calendar year.
- Report the LRAA of all monitoring locations that exceeded the MCL (this is in addition to listing any violations received).
- NOT report DBP results received as part of their chemical monitoring sampling, these results are not from the distribution system.

#### Violations and Assessments

If your water system received a violation (monitoring/reporting, public notice, MCL, Maximum Residual Disinfectant Level (MRDL), treatment technique, CCR, etc.), was required to conduct a Level 1 or Level 2 Assessment, or was cited for a sanitary survey deficiency during the reporting year, you **must** report this information.

- The template prompts you for the mandatory information: date of the violation, explanation of the violation, how long the violation occurred, what actions were taken to correct the violation, and the potential health effects of the MCL, MRDL, or treatment technique violations. The columns are labeled for your convenience.
- Violation information is available on your OneStop website.

#### Additional Monitoring (Unregulated Contaminants and Sodium)

All contaminant detections must be reported in your CCR, including detections of any unregulated contaminants. Detections found as part of the Unregulated Contaminant Monitoring Rule (UCMR3) fall under this requirement. If the water system had any contaminant detections under UCMR3 or other water system study. In a separate table the CCR **must**;

- List the contaminants detected.
- Identify the average and range at which the contaminant was detected.
- Explain the reasons for monitoring for unregulated contaminants.
- o No other additional language is needed (i.e. required health language).

# Bulk Water Delivery

If bulk water was delivered to the water system during the period covered by this CCR, you must include the following information regarding **each** delivery:

- Source(s) of the delivered water.
- Date(s) of delivery.
- Total amount of water delivered (in gallons).
- The reason(s) for the delivery.

### Secondary Fluoride Exceedance – Performing Public Notice in the CCR

Water systems that exceed the Secondary Maximum Contaminant Level (SMCL) of 2.0 mg/L for fluoride must provide public notice to their customers annually per Env-Dw 803.01. Community water systems have the option to provide this notice with their CCR. If the system chooses this option, it can either fill out and attach the Secondary Fluoride Public Notice form to the CCR or include all of the required language below (per Env-Dw 806.11) in the CCR.

"This is an alert about your drinking water and a cosmetic dental problem that might affect children under 9 years of age. At low levels, fluoride can help prevent cavities, but children drinking water more than 2 milligrams per liter (mg/l) of fluoride may develop cosmetic discoloration of their permanent teeth (dental fluorosis). The drinking water provided by your community water system [hame] has a fluoride concentration of [insert value] mg/l.

Dental fluorosis, in its moderate or severe forms, may result in brown staining and or pitting of the permanent teeth. This problem occurs only in developing teeth, before they erupt from the gums. Children under nine should be provided with alternative sources of drinking water or water that has been treated to remove the fluoride to avoid the possibility of staining and pitting of their permanent teeth. You may also want to contact your dentist about proper use by young children of fluoride-containing products. Older children and adults may safely drink the water.

Drinking water containing more than 4 mg/l of fluoride (the U.S. Environmental Protection Agency's drinking water standard) can increase your risk of developing bone disease. Your drinking water does not contain more than 4 mg/l of fluoride, but we are required to notify you when we discover that fluoride levels in your drinking water exceed 2 mg/l because of this cosmetic dental problem.

For more information, please call **hame of water system contact**] of **hame of community water system**] at **telephone number**]. Some home water treatment units are also available to remove fluoride from

drinking water. To learn more about available home water treatment units, you may call NSF International at 1-877-8-NSF-HELP.

Please share this information with all the other people who have children who drink this water, especially those who may not have received this notice directly (for example, people in apartments, schools, and daycares). You can do this by posting this notice in a public place or distributing copies by hand or mail."

#### **COMMON CCR MISTAKES**

Each year NHDES reviews a number of Consumer Confidence Reports (CCR) for content, accuracy and completeness. We have noted some common mistakes below. We hope you find this information helpful.

# Reporting Lead & Copper Results

Reporting Lead & Copper results in the CCR can be tricky because neither have an MCL. They have an Action Level (AL – the level at which action must be taken to address the contaminant if more than 10% of the results taken in any one monitoring round exceed the AL). This value is calculated and identified as the 90<sup>th</sup> percentile.

- Enter the 90<sup>th</sup> percentile value AND the number of samples exceeding the AL for your LAST lead
   copper monitoring into your CCR.
- The 90<sup>th</sup> percentile value is calculated for you by the department and is available on your OneStop page.
- All values must be entered as whole numbers. Multiply the lead value by 1000 to get ppb.
   Copper is a whole number and can be entered as is (ppm). To get the number of samples that exceeded the AL you will have to review the results from your last Lead and Copper sampling round.

## Listing Violations

List any violation received in the past year (or still open from a previous year) for monitoring, public notice, CCR, MCL, MRDL or treatment technique (Env-Dw 811.10).

- Clearly explain each violation.
- o Identify the date of and duration of the violation and if it continues.
- Describe actions taken to address the violation.
- o Describe potential health effects (for MCL, MRDL & treatment technique violations only).
- You can find a list of your violations on your OneStop page. Select the "V" icon at the top of the page.

# Listing Significant Deficiencies

List any identified significant deficiencies there were outstanding as of December 31.

- Describe the nature of the deficiency.
- The date the deficiency was discovered.
- The plan to address the deficiency, including a schedule, progress to date and interim measures taken.

Once you have completed the report brochure and table, change all the <u>blue text</u> to black. Print double-sided for ease of viewing and distribution.

#### **CCR DISTRIBUTION:**

Distribute the CCR by MAIL or DIRECT DELIVERY to ALL customers (billing units and/or service connections) and **to NHDES by July 1 of each year**. Public posting is not an acceptable means of distribution. Certain electronic delivery methods are allowed.

Accepted methods include:

- Door-to-door/ hand delivery of a paper copy.
- Mail a paper copy.
- Email CCR as an attachment.
- Email contents of the CCR as an embedded image in the email body.
- Mail notification that the CCR is available on the website (including notice on bill or as bill insert).
- Email notification and direct URL to CCR (including e-bill notices).
- Water systems serving more than 100,000 people must also to post the CCR on the internet.

Use any combination of the above methods to ensure that each consumer is notified.

Water Systems are also required make a "good faith" effort to reach non-bill paying consumers. These options include but are not limited to:

- Delivery of multiple copies to apartments, businesses, schools, nursing homes, and large private employers.
- Mail the CCR to postal patrons within the service area.
- Advertising availability of the CCR in news media.

- Publication of CCR in local newspaper.
- Posting the CCR in public places.
- Posting the CCR on the internet/social media.
- o Delivery to community organizations.

Include a note in the CCR, asking recipients to share the information with non-bill paying consumers.

#### **CERTIFICATION:**

You must certify to NHDES by July 10 of each year that the CCR was distributed in accordance with Env-Dw 811.

The Certification Form and instructions can be found on the <u>NHDES website</u>. Be sure to keep copies of the CCR and certification documents on file for at least three years.

**Note**: Failure to submit both a copy of the CCR **and** completed CCR Certification form to NHDES by the required dates (July 1 and July 10, respectively), will result in a violation being issued to the water system.

#### **NHDES Contacts**

General Information: 271-6703 dwmonitoring@des.nh.gov

Rule-related Contact: Chip Mackey 271-0655 <u>chip.mackey@des.nh.gov</u>